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ELECTION COMMISSION  
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JULY 16 2003

May 13, 2003

Federal Election Commission

Mr. John D. Gibson  
Assistant Staff Director  
Report Analysis Division  
999 E Street, N.W.  
Washington, D.C. 20463

Identification Number: COOO34785

Reference: Amended October Quarterly Report (7/1/02-9/30/02), received 1/23/03

Dear Mr. John D. Gibson:

This correspondence is in response to your letter of April 24, 2003, and Campaign Finance Analyst, Maureen Benitz's, letter of April 2, 2003. Please be advised that I am the General Counsel of ACA International, the trade association connected with the ACPAC ACA International Political Action Committee ("ACPAC"). Effective May 1, 2003, I was appointed as Treasurer of ACPAC by the ACPAC Board. On this same date, ACA's Director of Government Affairs, Jenifer Loon, was appointed as the Assistant Treasurer of ACPAC. In accordance with FEC requirements, this change was filed with the FEC electronically on May 8, 2003. Documentation of electronic filing of this amendment to the ACA International Political Action Committee Statement of Organization is attached hereto as Exhibit "A."

Ms. Benitz' letter of April 2, 2003, states that the Amended October Quarterly Report discloses additional receipts totaling \$13,635 that were not disclosed on the original report for this period. To appreciate the nature of my response to your request for clarifying information, I submit the following explanation.

The former Treasurer of ACPAC was an employee of ACA International who worked in the Legal and Government Affairs Department. He was originally appointed as treasurer of ACPAC on March 1, 2000. Since that date and through the date of his removal from office as Treasurer, he handled all of the books and records of ACPAC, maintained its accounts, handled receipts and disbursements and performed all FEC reporting services. From April 18 through April 23, 2003, the former Treasurer was on vacation. During this period, Jenifer Loon was charged with the responsibility of opening all of his mail and reviewing the nature of its contents.

On April 21, while reviewing the mail delivered to the former Treasurer, Jenifer Loon opened your letter to ACPAC dated April 17, 2003. She immediately reported receipt of this notice to me. Together, Jenifer and I began to search the files in the former Treasurer's office in an effort to find copies of any and all previous correspondence exchanged between the FEC and the former Treasurer.

#### **ACA International's Political Action Committee**

A copy of our report is available on the Federal Election Commission and is available for purchase from the FEC, Washington, D.C. 20463.

Mailing Address: ACA International • P.O. Box 290406 • Minneapolis, MN 55439-0406 • Tel. (952) 926-6547 • Fax (952) 926-1824

Mr. John D. Gibson  
May 13, 2003  
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On April 24, 2003, the former Treasurer returned to work and was subsequently terminated from employment at ACA International. Later that same day, I contacted the public accounting firm of Larson Allen and spoke with ACA International's CPA, John Tauer, about the alleged reporting discrepancies and the notices from the FEC. On this same day I notified the association's CEO and the association's Vice President of Finance of the same.

On April 25, 2003, ACA's Vice President of Finance, Mike Henke; Jenifer Loon; myself; and two support staff met with Mr. Tauer. During this meeting, we discovered errors noted in the various required FEC filings. As a result, I retained his public accounting firm to review all relevant ACPAC accounting transactions and to determine the extent of any reporting discrepancies as well as any other compliance issues.

From May 2, 2003, to May 9, 2003, the accounting firm has reviewed all detailed accounting records of ACPAC to verify the actual activities in the ACPAC accounts. This includes verifying any accounting transactions affecting the accounts of ACPAC from January 1, 2000, to December 31, 2002, including review of:

- general ledger transaction postings
- bank statements
- deposit slips
- all FEC reports filed
- database records for contributions received
- database records for all contributions to candidates

During this review, the public accounting firm confirmed that prior FEC reports did not contain accurate data. For example, discrepancies and accounting errors noted as of January 1, 2000, became larger over the course of time through December 31, 2002.

Throughout both our internal and external review of ACPAC activities we have not discovered any intentional disregard for FEC compliance requirements and the issues that have been identified appear limited to one individual's inability to properly record accounting transactions.

We are currently in the process of amending all incorrectly filed FEC reports from January 1, 2000, to December 31, 2002, by using a public accounting firm to reconcile the data and prepare the reports. We are committed to filing all accurate reports within 30 days.

In relation to the specific questions on the additional receipts totaling \$13,635, and based upon the detailed analysis and report of Mr. Tauer, we do not know specifically why the original report only

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included \$12,200 for contribution receipts, versus the amended report amount of \$25,835, due to the fact that the Treasurer who filed the reports is no longer associated with the PAC. We can however assure the FEC that we have verified that we did receive \$25,235 in contributions from July 1, 2002, to September 30, 2002. We have attached a list of all contributions received during this period, which reconciles to the previously filed FEC report and the actual receipts. The correct amount of receipts received during this time period should have been \$25,235, based on verified bank deposits and credit card charges. The amended report was overstated by \$600. This will be corrected.

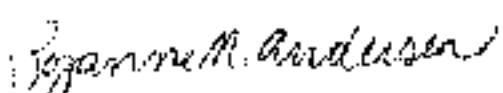
In order to assure the Federal Election Commission that these reporting deficiencies will not occur in the future, we have made significant changes to the operations of the PAC. This includes:

- electing a new Treasurer and Assistant Treasurer
- contracting with outside professionals that are experienced in dealing with PACs
- adding additional internal controls and procedures within ACA International
- strengthening internal record-keeping systems

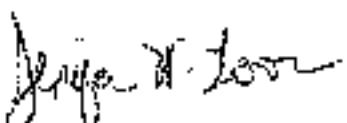
Finally, I wish to report that I called a meeting of the ACPAC Committee on May 6, 2003. During this meeting, I notified the Committee of the former Treasurer's receipt of notices from the FEC. Following disclosure of this information to the Committee, the former Treasurer was terminated from the office of treasurer and Jenifer and I were appointed as Assistant Treasurer and Treasurer respectively effective May 1, 2003.

If you have any questions about this correspondence, the past activities of ACPAC or the corrective action we have taken to prevent any future reporting discrepancies, I urge you to contact me personally.

Sincerely,



Rozanne M. Anderson  
Treasurer



Jenifer W. Loom  
Assistant Treasurer

Enclosures



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20580

Thomas Cieslukowski, Treasurer  
ACPAC ACA International Political Action  
Committee  
4040 W. 70<sup>th</sup> Street  
Minneapolis, MN 55435

APR 02 2003

Identification Number: C00034785

Reference: Amended October Quarterly Report (7/1/02-9/30/02), received 1/23/03

Dear Mr. Cieslukowski:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses additional receipts totaling \$13,635 on Lines 11a(i) and 11a(ii) of the Detailed Summary Page that were not disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designation and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Maureen Benitz  
Campaign Finance Analyst  
Reports Analysis Division



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 24, 2003

Thomas Cieslukowski, Treasurer  
ACPAC ACA International Political Action  
Committee  
4040 W. 70<sup>th</sup> Street  
Minneapolis, MN 55435

Identification Number: C00034785

Reference: Amended October Quarterly Report (7/1/02-9/30/02), received 1/23/03

Dear Mr. Cieslukowski:

This letter is to inform you that as of April 23, 2003, the Commission has not received your response to our request for additional information, dated April 2, 2003. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by May 14, 2003. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter, please contact Maureen Benitz on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

## (Exhibit A)

-----Original Message-----

From: Facefl FEC Filing Server [mailto:<http://db@nicvalin2.sdrdc.com>]  
Sent: Thursday, May 08, 2003 9:06 AM  
To: Roxanne Andersen  
Subject: FEC Electronic Filing Results

DISCLOSE -- SEC Financial Disclosure Filing Acknowledgement

This is to acknowledge the receipt and acceptance of your electronic filing via the DISCLOSE protocol.

Your filing was received and accepted by our system at 05/08/2003 - 10:05:53, and was assigned the Filing ID of: FECO-84335

NOTE: The electronic filing format has been updated. Please update your software prior to filing your next report.

Please make a note of this, as it will be necessary to refer to this information in the future.

Thank you for using DISCLOSE.

For your reference, the output of the validation check was as follows:

FEC File Validator Version 4.00.14

Developed for the Federal Election Commission  
by NIC Technologies, Inc. 1996-2000

==== Identification Section =====

Committee ID: C00034785  
Committee Name: ACPAC ACA International Political Action Committee  
Filing Type: FIN  
Filing Date: 19760217

Software/Ver#: KNOWLEDGE / Ver# XP.1108

==== Results Section =====

>>>--> FEC data file PASSED validation! <----<<  
MD5 checksum:  
4e93d93afdb87ed5733d61b1511e50d6b

ACPA/CNA International Political Action Committee  
2nd Quarter 2002  
Receipts

23038080703

Reference #	Individual	Date	Amount	Type	Classification
Unitemized					
2001253	Terry Hess	07/19/2002	10.00	g	cash
0209001	Unitemized	07/23/2002	25.00	s	cash
2037145	Daniel W. Van Koten	07/23/2002	25.00	c	6312
3089207	Mark Stephold	07/03/2002	25.00	c	5639
3016459	P.J. Turner	07/21/2002	30.00	c	5636
2010125	Aiken Van Schick	07/12/2002	50.00	c	8477
2002112	Jerold J. Waggoner	07/12/2002	50.00	c	3749
2513748	Robert Antonucci	07/12/2002	50.00	b	6379
2013243	Gregory V. Reining	07/12/2002	50.00	c	9111
2002070	James L. Judd	07/12/2002	50.00	c	11210
3024874	Naomi A. Lake	07/11/2002	50.00	c	5213
2011266	David R. Missup	07/19/2002	50.00	c	6203
2020871	Kensyn T. Green	06/19/2002	50.00	c	1707
2512582	Kenneth W. Smith	06/19/2002	50.00	c	1182
2022951	Kerri Knous	06/19/2002	50.00	c	1355
3024045	Michael K. Radtke	08/19/2002	50.00	v	4982
25016101	Carl H. Slioz	05/03/2002	50.00	c	5858
2516327	Carol Williamson	06/19/2002	50.00	c	6396
2064932	Gary D. Roberts	08/08/2002	50.00	c	6376
3024559	Christopher Morgan	07/23/2002	50.00	s	cash
3022134	Fred Daviie	07/23/2002	50.00	f	cash
2543486	Pat D. Nagy	07/23/2002	50.00	a	cc
2002944	Roger Abner	07/23/2002	50.00	c	1926
2547925	Thomas G. Morgan	07/23/2002	50.00	a	65
2504120	Benjamin A. Burdell	07/19/2002	50.00	c	2313
2501304	Christina P. Trull	07/18/2002	50.00	c	6716
2506667	Stewart J. Finece	07/18/2002	50.00	c	6056
2506101	Carroll Shiner	07/03/2002	50.00	v	cc
2012825	Charles W. Busch	07/03/2002	50.00	c	3875
2087273	Dema B. Sheppard	07/05/2002	50.00	c	4351
2537640	Debbie Maybee-Buxton	07/03/2002	50.00	c	4178
2007534	Donald G. Schaefer	07/03/2002	50.00	c	12229
2014397	John L. Watson	07/03/2002	50.00	c	323
2021073	Lake-Cruver	07/03/2002	50.00	v	cc
2020965	Michael J. Creek	07/03/2002	50.00	v	cc
2546489	Pamela C. Miskulin	07/03/2002	50.00	v	cc
2514055	Scott Q. Konig	07/03/2002	50.00	v	cc
2008252	Shirley D. Messan	07/03/2002	50.00	c	1472

3004175	John P. Murray	75.00	cc
2019541	Jean L. Smith	100.00	C
2026954	Dan Nichols	09/12/2002	12633
2019592	Eric P. Parker	09/12/2002	100.00
2542942	Kellay R. Lutz	09/12/2002	Y
2502025	Timothy Meyer	09/12/2002	100.00
2022019	William M. Hill	09/12/2002	100.00
2005217	J. Womme C. Agerton	09/11/2002	3846
2022372	Robert Balonacki	09/11/2002	4193
2004473	Alex G. Eagle	08/19/2002	5045
2012496	Gary R. Unsworth	08/19/2002	190.00
2019895	Michael D. Fettig	08/19/2002	2487
2004737	T. W. Muse	08/19/2002	100.00
2611130	Darwin Baker	08/09/2002	100.00
2502254	Brian Watkins	08/08/2002	9111
2028389	Chris Ray	08/06/2002	2870
2005157	Pete B. Bassett	08/05/2002	100.00
2514454	Mickie Neel	08/04/2002	100.00
2019494	Robert F. Deleichter	08/03/2002	1181
2506916	David Sage	07/23/2002	1713
2010360	Jimmy V. Smith Sr.	07/23/2002	100.00
2002635	Jessica Holland	07/23/2002	8862
2019921	Jon G. Domo	07/23/2002	1699
2014607	Stephanie Pfeifer	07/23/2002	1194
2505898	Thomas M. Giambor	07/23/2002	cash
2009132	Colleen Remond	07/19/2002	4936
2505147	Howard E. Spalter	07/19/2002	cash
2008771	Judy Jordan	07/19/2002	2713
2022233	William E. Hopkins	07/19/2002	7635
2025617	David A. Miskell	07/18/2002	100.00
2023642	Katherine H. Kingstrand	07/18/2002	546
2012406	Kevin T. Kharas	07/18/2002	1079
2501302	Paul D. Reed	07/18/2002	100.00
2026469	Rob H. Gibbs	07/18/2002	8180
2021212	Thomas Haggensmiller	07/18/2002	8015
2544662	Fran Fisher	07/16/2002	1226
2506805	R. Fred Houston	07/16/2002	100.00
2029131	Ajaean Reiss	07/13/2002	cc
2023601	Candace Landre	07/03/2002	4659
3008899	George Johnson	07/03/2002	3411
2001121	Mary C. Sanders	07/03/2002	cc
2003905	Richard T. Bonelli	07/03/2002	cc
2017239	Shirley Chappel	07/03/2002	7417
2001192	Terry G. Coffey	07/03/2002	5466
2015845	William R. Hamel	07/03/2002	100.00

2004189	Thomas H. Cudahen	07/23/2002		Visa
2545502	Bernard P. Danchue	09/11/2002	200.00	visa
2026004	Joseph C. Mersola	09/11/2002	200.00	3403
2008340	Kathy J. Connery	09/11/2002	200.00	1096
2047629	Sandyn C. Tloungaski	09/11/2002	200.00	Visa
2011476	Daniel L. O'Connell	08/08/2002	200.00	6293
2016659	N. Scott Burkhardt	08/08/2002	200.00	7839
2007287	Pete B. Thompson	09/09/2002	200.00	6823
2012832	Laura D. Gotwin	07/29/2002	200.00	et
2504792	Bonita Gjurasit	07/21/2002	200.00	8464
2022239	Christina Holahan	07/21/2002	200.00	mc
2005766	Franklin Pace	07/23/2002	200.00	mc
2020753	George Goodyear, III	07/23/2002	200.00	visa
2013869	Jo Ann Smith-Heckman	07/23/2002	200.00	2796
2024899	Jessica Raines	07/23/2002	200.00	2555
3001020	Pauline R. Kueper	07/21/2002	200.00	visa
2015207	Robert J. Bandas	07/23/2002	200.00	2144
2021056	Sabre Grossheili	07/23/2002	200.00	1933
2536986	Stephen W. Gaines	07/23/2002	200.00	5805
2029209	Nat Rubinfield	07/19/2002	200.00	11740
2023830	Ned E. Koenig	07/19/2002	200.00	1364
2027615	Paul R. Peart	07/19/2002	200.00	4975
2010220	Shirley Brown	07/19/2002	200.00	3148
3005827	Ann Dennis Coffey	07/16/2002	200.00	cc
2500116	Robert A. Giudwin	07/16/2002	200.00	cc
2013632	Eric F. Snyder	07/03/2002	200.00	2385
2400056	Jack Hood	07/03/2002	200.00	5421
2037526	Jackie Warick	07/03/2002	200.00	11521
2591685	Judy Schmitz-Gunn	07/03/2002	200.00	9667
2555215	Mark L. Martin	07/03/2002	200.00	cc
2020652	Rick Gellert, II	07/05/2002	200.00	cc
2038316	Sophia W. Wolfson	07/03/2002	200.00	cc
2022614	Steven J. Hunter	07/03/2002	200.00	cc
	Unidentified		12,785.00	
	Justified			
2038500	Vic C. York	07/23/2002	\$0.00	cash
2002803	Philip Rosenblatt	07/23/2002	\$00.00	3783
2002500	Ron L. Brown	07/23/2002	\$00.00	cash
2038412	Torraine A. Wiersch	07/23/2002	\$00.00	cc
2545037	Phil Brannen	07/03/2002	\$00.00	cc
2038500	Vic C. York	07/23/2002	\$0.00	cc
2002803	Philip Rosenblatt	08/01/2002	200.00	visa
2013294	Mark E. Davitt	07/23/2002	200.00	visa

Per FRC Attended Report

254597	Phil Bennett	07/23/2002		mc
2K2540	Ron L. Brown	07/05/2002	200.00	C 4055
2024095	Frank C. Lamb	09/11/2002	250.00	V Visa
201898	Thomas M. Decker	08/08/2002	250.00	C 1352
2014219	Dudley Kilwell	07/23/2002	250.00	A cc
2025699	Jay D. Riedman Sr.	07/23/2002	250.00	C 11931
2002220	Stephen P. Miller	07/16/2002	250.00	C cc
2024347	Russ Leavitt	07/03/2002	250.00	V cc
2038454	Theresa M. Yule	07/05/2002	250.00	V cc
2017527	Wayne Cody	07/09/2002	250.00	C 12449
2043901	Donald D. Wood	07/03/2002	350.00	C 1623
2025069	Michael P. Murray	07/04/2002	350.00	C 1504
2026923	Peter H. Morgan	07/15/2002	300.00	C 8222
2011460	Harold L. Layden	07/03/2002	500.00	V cc
2029879	Raymond H. Robertson	07/08/2002	300.00	Visa
2019899	Donald C. Jollesher	07/23/2002	1,000.00	V Visa
2007777	Dwayne A. Blackett	07/23/2002	1,000.00	V Visa
2035761	Jeffery L. Spiegelhalter	07/23/2002	1,000.00	Vcc
2028534	Michael P. Reilly	07/23/2002	1,000.00	mc
2013215	Donald Puchals	07/19/2002	1,000.00	C 616
2029184	Myron D. Keayland	07/03/2002	1,000.00	C 3014
2042456	Robert L. Leovic	07/01/2002	1,000.00	V cc
	Total Itemized		13,050.00	
<b>Grand Total Per Database</b>				
<b>25,435.00</b>				

**Deposits in FEC Report**

	Cash/Check	Credit Card	Total
George Antonius	9/12/2002	200.00	C
Michael K. Rainwater	08/19/2002	-50.00	V Visa
Frank C. Lamb	09/11/2002	-250.00	V Visa
Sandra C. Thompson	09/11/2002	-200.00	V Visa
Dominic P. DiGiulio	09/11/2002	-200.00	V Visa
Erik P. Feikor	08/12/2002	-100.00	V Visa

**Deposits Per Bank Accounts**

	Cash/Check	Credit Card	Total
July	9,440.00	10,525.00	
August	2,600.00	1,100.00	
Sept	1,600.00		
<b>Total Deposits</b>	<b>13,610.00</b>	<b>11,625.00</b>	<b>25,235.00</b>

Contribution never recorded - this recorded as unitemized receipt  
 Reported as credit card contribution above but card was never charged  
 Reported as credit card contribution above but card was never charged  
 Reported as credit card contribution above but card was never charged  
 Reported as credit card contribution above but card was never charged  
 Reported as credit card contribution above but card was never charged

No outstanding expenses at 9/30/02

	Cash/Check	Credit Card	Total
July	9,440.00	10,525.00	
August	2,600.00	1,100.00	
Sept	1,600.00		
<b>Total Deposits</b>	<b>13,610.00</b>	<b>11,625.00</b>	<b>25,235.00</b>

## Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt 5/14/03
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED (R/C)
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House Office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):  <i>[Signature]</i>	Postmarked and/or Date of Receipt  <i>5/14/03</i>
<input type="checkbox"/> Electronic Filing	
<i>[Signature]</i> PREPARED	DATE PREPARED <i>5/14/03</i>